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Via ECF

Hon. Lewis J. Liman, U.S.D.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Michael D. Cohen v. United States of America, et al.*
Case No.: 1:21-cv-10774-LJL

Dear Judge Liman:

As you are aware, my office represents the defendant, Donald J. Trump (“Mr. Trump” or “Defendant”), in the above-referenced matter. I write in response to the letter filed yesterday by plaintiff’s counsel, Jeffrey K. Levine, Esq., which was purportedly offered as a “supplement” to the arguments held before Your Honor at the preliminary conference on April 7, 2022.

Defendant wholly and adamantly objects to counsel’s submission of his unprompted and inappropriate filing. Mr. Levine’s letter serves no legitimate purpose and—consistent with his client’s *modus operandi*—amounts to nothing more than an unfounded public attack against Mr. Trump. Indeed, it is readily apparent that counsel’s letter is merely a thinly-veiled attempt to exploit this Court’s routine proceeding as a means of publicly disparaging my client.

To start, Mr. Levine’s letter is littered with mischaracterizations and misrepresentations about the matters discussed therein. For instance, what Mr. Levine twice refers to as “breaking news” in the pending matter involving Mr. Trump and the Office of the Attorney General (OAG) is in fact nothing of the sort. Rather, all that occurred was the *filing* of a motion – one that lacks merit and will be contested. Mr. Trump has not even had the opportunity to file an opposition, much less receive an adjudication on the merits. More alarmingly, in his letter, Mr. Levine puts forth numerous false and inflammatory statements about Mr. Trump and the undersigned counsel which cannot be construed as anything less than an improper attempt to influence Your Honor.¹

Mr. Levine’s baseless accusations—and unseemly attempts to influence this Court—are unwarranted, unacceptable, and, most of all, unprofessional.

¹ To be clear, the undersigned does not suggest that Your Honor’s impartiality has been affected in any way; rather, reference to the prejudicial nature of the statements made by opposing counsel is merely intended to reflect upon his improper motive for doing so.

Thank you for your courtesy and attention to this matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Alina Habba', with a long, sweeping horizontal line extending to the right.

Alina Habba, Esq.

For HABBA MADAI & ASSOCIATES LLP

cc: Jeffrey K. Levine, Esq.
Andrew C. Laufer, Esq.
Allison Rovner, Esq.
Alyssa O’Gallagher, Esq.